

## Yohannes, Lia

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**From:** Harris, Stewart <Stewart\_Harris@americanchemistry.com>  
**Sent:** Wednesday, May 8, 2019 5:22 AM  
**To:** Yohannes, Lia  
**Cc:** Swearingen, Anastasia; LaMotte, K. R.  
**Subject:** Points on Fluoropolymers

Hi Lia,

Here are some points that could be used to push back against the IPEN proposal to delete the list of fluoropolymers from Annex IX, if this starts to get legs and any Party picks up these suggestions.

Thanks

- In 2009, the OECD Expert Group on Polymers agreed that, “Polymers of low concern are those deemed to have insignificant environmental and human health impacts” (OECD 2009). Thus, there was agreement within the OECD that polymeric chemicals meeting these criteria have a low hazard potential. This includes considerations related to degradation.
- Fluoropolymers meet the widely accepted assessment criteria to be considered PLCs and therefore are considered to be of low hazard to human health and the environment. See the paper published last year: <https://setac.onlinelibrary.wiley.com/doi/full/10.1002/ieam.4035>. As noted in the publication, “This paper brings together fluoropolymer toxicity data, human clinical data, and physical, chemical, thermal, and biological data for review and assessment to show that fluoropolymers satisfy widely accepted assessment criteria to be considered as “polymers of low concern” (PLC).”
- Fluoropolymers would not meet any criteria for “hazardous” designation. Indeed, they would generally be accepted as being “non-hazardous” so appropriately referenced on Annex 9.
- FYI, the terminology used in Annex 9 is confusing. The title is “fluorinated polymers” but the specific substances referenced are “fluoropolymers”. The two are different. If there is a need to “retitle” the section that may be appropriate and could help address any misunderstandings.
- Given the many important uses of fluoropolymers across key sectors (autos, aerospace, electronics, semiconductors, building and construction, energy production and storage, etc.), changes in the Annexes that would in any way restrict the movement of these materials would undermine recycling and objectives related to the circular economy.

Let me know if you have any questions.

Thanks,  
Stew

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